



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 13, 2018

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Vladimir Ziskind, et al.*, 18 Cr. 375 (VSB)

Dear Judge Broderick:

The Government respectfully writes on behalf of all parties in this case to jointly request that the Court enter the enclosed protective order. The proposed protective order will govern the Government's production of discovery in this case, and all parties have agreed to it. The proposed protective order will facilitate the production of discovery by ensuring that materials that are produced are treated with appropriate confidentiality.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

/s/
Max Nicholas
Assistant United States Attorney
(212) 637-1565

cc (by ECF): All defense counsel